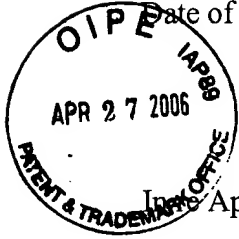


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Date of Deposit: April 27, 2006

Our Case No. 8285-375



**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Inventor Application of:

Tiliks et al.

Serial No.: 09/741,734

Filed: December 19, 2000

For: Method and System for Dual  
Ringing of a Centrex Line  
and a Wireless Extension of the  
Centrex Line

Examiner: B. Miller

Group Art Unit: 2683

**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Mail Stop AF  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

Applicants request review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reasons stated on the attached sheets. No more than five (5) pages are provided.

**I. There Is No Motivation to Combine Emery et al. and O'Neil et al.**

In the Final Office Action of December 9, 2005, all of the claims were rejected in view of the proposed combination of U.S. Patent No. 5,353,331 to Emery et al. and U.S. Patent No. 5,963,864 to O'Neil et al. All of the pending claims recite a wireless extension of a Centrex line. The Examiner admitted that O'Neil et al. fails to teach a wireless extension of a Centrex line and relied upon Emery et al. in an attempt to cure this deficiency. The Examiner asserted that one skilled in the art would have been motivated to make this combination "because O'Neil allows for the interconnection of two communication systems so that a wireline may be connected to a wireless unit and this would allow for an improved method of call completion using an existing telecommunications network."

Applicants respectfully submit that there would have been no need for one skilled in the art to have combined Emery et al. with O'Neil et al. because Emery et al. alone provides the very result that the Examiner is asserting to be the motivation for combining the two references.

Col. 11, lines 6-22 of Emery et al. state (emphasis added):

***To provide wireless centrex services to a particular location***, which may be the same customer premises 141, lines 145 connect the PCS MC 119 to macrocell antennae within the customer's building. Although shown as a single building, the integrated Centrex could cover a broader area, for example an entire college campus. ***The PCS system can integrate a customer's existing wireline-based Centrex or PBX services with a wireless version of those services.*** PCS will allow four digit dialing of the personal Centrex or PBX number, and it will recognize when the personal user is located within a unique wireless environment based upon registration information sent to it by the wireless Centrex/PBX provider for delivery of calls. ***Calls to the Centrex/PBX number will be automatically routed to wherever the personal user is, be it wired or wireless and on any connecting network.***

Applicants respectfully submit that one skilled in the art would not have combined Emery et al. with O'Neil et al. to provide wireless Centrex service because Emery et al. already provides that service. Because Emery et al. already provides the result that was the basis of the proposed

combination, Applicants respectfully submit that there would have been no motivation to combine Emery et al. with O'Neil et al. Because the required motivation is lacking, Applicants respectfully submit that the rejections of the claims should be removed.

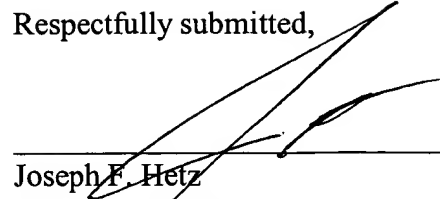
**II. The Examiner Previously Admitted There Was No Motivation to Combine Emery et al. and O'Neil et al.**

As in the present Office Action, in the January 15, 2004 Office Action, the Examiner based rejections on the proposed combination of Emery et al. and O'Neil et al. Applicants traversed those rejections, and the Examiner agreed that there was no motivation to combine those references and withdrew the rejections. Since the Examiner previously agreed that there was no motivation to combine Emery et al. and O'Neil et al., Applicants respectfully submit that the proposed combination of Emery et al. and O'Neil et al. should not be used to reject the claims.

Applicants also note that this application has been pending for over five years and that five Office Actions have been issued. The rejections in three of those Office Actions were withdrawn due to lack of motivation to combine, and the rejections in the present Office Action are based on a proposed combination that the Examiner previously admitted lacked the requisite motivation to combine. It is apparent that, after conducting numerous prior art searches, the Examiner has not found prior art that renders the claims unpatentable. However, instead of issuing a Notice of Allowance, the Examiner rejected the claims based on a proposed combination that the Examiner previously admitted to be improper. Applicants respectfully submit that such action is unduly delaying the prosecution of this application and requests that a Notice of Allowance be issued immediately.

Dated: April 27, 2006

Respectfully submitted,



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